

From: [Helmlinger, Andrew](#)
To: [McFarland, Clif](#)
Cc: [Wesling, Mary](#)
Subject: Rancho consequence radius, Question from Mr. Curnow
Date: Tuesday, December 10, 2013 11:31:54 AM
Attachments: [Gunter to EPA-Mary.pdf](#)

Clif,

Mary Wesling forwarded to me the post, below, from Rancho LPG's Ron Curnow. Although Mary asked me to respond to Mr. Curnow's inquiry, given our relative position in enforcement I think it best to communicate directly with you. As we have discussed recently, I can confirm that EPA calculated the consequence radius from the main tanks at the Rancho LPG facility to be 0.5 miles based on EPA's regulatory formula. There is not a document created by Mary's review that state this, but we have provided responses to the community (and to Rancho) periodically confirming this point. It would be factually accurate for Rancho to make a statement that EPA has calculated the consequence radius, consistent with the regulations, to be 0.5 miles, and not three miles as Ms. Gunther asserts. The calculation does factor in the benefit of Rancho's containment basin, and as we have discussed, the consequence radius likely would be greater without the benefit of the secondary safety feature.

Best,

J. Andrew Helmlinger

From: Ronald Conrow <Ronald.Conrow@plainsmidstream.com>
Sent: Thursday, December 05, 2013 7:13 AM
To: Wesling, Mary
Subject: Gunter to EPA-Mary

Mary,

Attached is an e-mail correspondence from Janet Gunter to you and numerous others. As usual her claims against Rancho are unfounded and have no regulatory or legal supportive documentation. I have drafted a response to local lawmakers to provide documented responses to Ms. Gunter's claims, including the assumptions made by Professor Heaton about Rancho's refrigerated tanks.

However, on page 2, Ms. Gunter is again claiming a blast radius of over 3-miles from one Rancho refrigerated tank using EPA calculations. Is the blast radius correct and in accordance to the parameters stated in 40CFR68 for a "worst case" release scenario for the largest tank (one) of refrigerated butane into passive mitigation system with an ensuing vapor cloud explosion?

As District Manager with oversight for the Rancho LPG facility located at 2110 North Gaffey Street in San Pedro, CA, I hereby state the "worst case" scenario for the facility based upon parameters

set forth in EPA regulation 40CFR68 is 0.5 miles at a 1.0psi overpressure to endpoint? Has the EPA reviewed Rancho's "worst case" release scenario as submitted in our Risk Management Plan (RMP) and is it accordance with EPA regulation 40CFR68? Is this RMP available for public review at the local Administering Agency (AA) which is the LAFD/CUPA office in downtown Los Angeles?

Regards,


Ron Conrow


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